

COPY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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In the Matter of:)
Geason Enterprises, L.L.C.,)
GE Ventures, L.P., Hammerhead)
Off-Road, Inc., TJ Power Sports L.L.C.,)
Shanghai Howhit Machinery Manufacture)
Co. Ltd., and Shanghai Tong Jian Sports)
Equipment Co., Ltd.)

Docket No. CAA-HQ-2013-8050

HAMMERHEAD'S ANSWER TO THE COMPLAINT AND REQUEST FOR HEARING

NOW COMES, Geason Enterprises, L.L.C., GE Ventures, L.P., Hammerhead Off-Road, Inc., and TJ Power Sports L.L.C., (collectively, "Hammerhead" or "Hammerhead Respondents") by and through their counsel, Bracewell & Giuliani LLP, hereby answers the Complaint filed by the United States Environmental Protection Agency ("EPA"), as follows:

- 1. By letter dated July 30, 2013, the U.S. Environmental Protection Agency, Headquarters ("EPA"), issued a Complaint to Hammerhead and Shanghai Howhit Machinery Manufacture Co. Ltd., and Shanghai Tong Jian Sports Equipment Co., Ltd. (collectively, "Other Respondents").
2. Hammerhead denies the allegations in the Complaint and that they are liable for any damages. At all relevant times, the Hammerhead Respondents acted in good faith to comply with the Clean Air Act.
3. Hammerhead hereby provides its answer to the Complaint ("Answer") and respectfully requests a hearing upon the issues raised in the Complaint and this Answer pursuant to 40 C.F.R. §22.15(c).

4. For easy cross-reference, Hammerhead follows the same order and paragraph number in the Complaint in this Answer.

Preliminary Statement

1. Paragraph 1 of the Complaint contains a preliminary statement regarding the statutory authority to issue the Complaint. These are statements and/or conclusions of law to which no response is required. To the extent a response is required, Hammerhead hereby denies the allegations in Paragraph 1.
2. Paragraph 2 of the Complaint contains a preliminary statement regarding the statutory authority and delegations of authority to issue the Complaint. These are statements and/or conclusions of law to which no response is required. To the extent a response is required, Hammerhead hereby denies the allegations in Paragraph 2.
3. To the extent applicable to the Hammerhead Respondents, Hammerhead admits the allegations in Paragraph 3.
4. Hammerhead admits the allegations in Paragraph 4.
5. GE Ventures, L.P., is a limited partnership formed in 2005 that operated from 2005 to 2009 and was organized under the laws of the State of Texas.
6. Hammerhead admits the allegations in Paragraph 6.
7. Hammerhead admits the allegations in Paragraph 7.
8. Hammerhead admits the allegations in Paragraph 8.
9. The allegations in Paragraph 9 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 9
10. Hammerhead has insufficient knowledge or information to admit or deny the allegations in Paragraph 10 and therefore denies same.

11. Hammerhead has insufficient knowledge or information to admit or deny the allegations in Paragraph 11 and therefore denies same.
12. Shanghai Howhit Machinery Manufacture Co., Ltd., is the manufacturer designated in the COC application for the following engine family: BGSNX.150LUV. Shanghai Tong Jian Sports Equipment Co., Ltd., is the manufacturer designated in the COC application for the following engine families: ATJPX.250GAL, ATJPX.150GAL, 9TJPX.150GAL, 9TJPX.250GAL, 8TJPX.250GAL, 8TJPX.150GAL, 7TJPX.150150 and 7TJPX.250250. Hammerhead was never issued a COC for 8TJPX.500UAL.
13. The terms of any alleged agreement and its characterization in Paragraph 13 are conclusions of law to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 13.
14. Hammerhead has insufficient knowledge or information to admit or deny the allegations in Paragraphs 14(a) and 14(b) and therefore denies same.

Jurisdiction

15. Paragraph 15 of the Complaint consists of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 15.
16. Paragraph 16 of the Complaint consists of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 16.
17. Hammerhead has insufficient knowledge or information to admit or deny the allegations in Paragraph 17 and therefore denies same.

18. Paragraph 18 of the Complaint consists of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 18.

Governing Law

19. Paragraph 19 of the Complaint consists of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 19.

20. Paragraphs 20(a) through 20(m) of the Complaint consist of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 20(a) through 20(m).

Certification Requirements

21. The allegations in Paragraph 21 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 21.

22. The allegations in Paragraph 22 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 22.

23. The allegations in Paragraph 23 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 23.

24. The allegations in Paragraph 24 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in

Paragraph 24.

25. The allegations in Paragraph 25 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 25.
26. The allegations in Paragraph 26 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 26.
27. The allegations in Paragraph 27 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 27.
28. The allegations in Paragraph 28 purport to state legal conclusions based on EPA's draft guidance to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 28.
29. The allegations in Paragraph 29 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 29.
30. The allegations in Paragraph 30 appear to state legal conclusions but provide no citation and no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 30.
31. The allegations in Paragraph 31 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 31.
32. The allegations in Paragraph 32 state legal conclusions to which no answer is required. To

the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 32.

33. The allegations in Paragraph 33 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 33.

34. The allegations in Paragraph 34 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 34.

35. The allegations in Paragraph 35 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 35.

Labeling Requirements

36. The allegations in Paragraph 36 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 36.

37. The allegations in Paragraph 37 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 37.

Recordkeeping Requirements

38. The allegations in Paragraph 38 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 38.

39. The allegations in Paragraph 39 state legal conclusions to which no answer is required. To

the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 39.

40. The allegations in Paragraph 40 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 40.

41. The allegations in Paragraph 41 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 41.

Civil Penalties

42. The allegations in Paragraph 42 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 42.

43. The allegations in Paragraph 43 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 43.

44. The allegations in Paragraph 44 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 44.

Alleged Violations of Law

45. The allegations in Paragraph 45 state legal conclusions to which no answer is required. To the extent that the Hammerhead Respondents are required to respond, Hammerhead hereby denies the allegations in Paragraph 45. Hammerhead has insufficient knowledge or information to admit or deny the allegations with respect to the Other Respondents.

46. The allegations in Paragraph 46 state legal conclusions to which no answer is required. To the extent that the Hammerhead Respondents are required to respond, Hammerhead hereby denies the allegations in Paragraph 46. Hammerhead has insufficient knowledge or information to admit or deny the allegations with respect to the Other Respondents.
47. Shanghai Howhit Machinery Manufacture Co., Ltd., is the manufacturer designated in the COC application for the following engine family: BGSNX.150LUV. Shanghai Tong Jian Sports Equipment Co., Ltd., is the manufacturer designated in the COC application for the following engine families: ATJJPX.250GAL, ATJJPX.150GAL, 9TJJPX.150GAL, 9TJJPX.250GAL, 8TJJPX.250GAL, 8TJJPX.150GAL, 7TJJPX.150150 and 7TJJPX.250250. Hammerhead was never issued a COC for 8TJJPX.500UAL.
48. Geason Enterprises, L.L.C., Hammerhead Off-Road, Inc., and TJ Powersports, L.L.C., are holders of the following EPA-issued COCs at issue in this case: BGSNX.150LUV, ATJJPX.250GAL, ATJJPX.150GAL, 9TJJPX.150GAL, 9TJJPX.250GAL, 8TJJPX.250GAL, 8TJJPX.150GAL, 7TJJPX.150150 and 7TJJPX.250250. Hammerhead was never issued a COC for 8TJJPX.500UAL.
49. Hammerhead has insufficient knowledge or information to admit or deny the allegations in Paragraph 49 and therefore denies same.
50. Hammerhead denies the allegations contained in Paragraph 50 of the Complaint.
51. Paragraph 51 of the Complaint consists of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 51.

COC Violations

52. Hammerhead addresses the allegations contained in Paragraph 52(a) through 52(d) of the Complaint below:

- a. The allegations in Paragraph 52(a) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 52(a).
- b. The allegations in Paragraph 52(b) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 52(b).
- c. Hammerhead admits the allegations in Paragraph 52(c).
- d. The allegations in Paragraph 52(d) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 52(d).

53. Hammerhead addresses the allegations contained in Paragraph 53(a) through 53(f) of the Complaint below:

- a. The allegations in Paragraph 53(a) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 53(a).
- b. The allegations in Paragraph 53(b) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 53(b).
- c. Hammerhead admits that Shanghai Tong Jian Sports Equipment Co., Ltd. is the manufacturer listed on the COC application for the engine family alleged in

Paragraph 53(c). Paragraph 53(c) fails to identify with specificity the vehicles that EPA claims included a Vehicle Identification Number indicating a different manufacturer and therefore, Hammerhead has insufficient knowledge or information to admit or deny any other allegations contained in Paragraph 53(c).

- d. The allegations in Paragraph 53(d) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 53(d).
- e. Hammerhead admits the allegations in Paragraph 53(e).
- f. The allegations in Paragraph 53(f) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 53(f).

54. Hammerhead addresses the allegations contained in Paragraph 54(a) through 54(e) of the Complaint below:

- a. The allegations in Paragraph 54(a) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 54(a).
- b. The allegations in Paragraph 54(b) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 54(b).
- c. The allegations in Paragraph 54(c) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 54(c).
- d. Hammerhead admits the allegations in Paragraph 54(d).

- e. The allegations in Paragraph 54(e) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 54(e).

55. Hammerhead addresses the allegations contained in Paragraph 55(a) through 55(f) of the Complaint below:

- a. The allegations in Paragraph 55(a) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 55(a).
- b. The allegations in Paragraph 55(b) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 55(b).
- c. Hammerhead admits that Shanghai Tong Jian Sports Equipment Co., Ltd. is the manufacturer listed on the COC application for the engine family alleged in Paragraph 55(c). Paragraph 55(c) fails to identify with specificity the vehicles that EPA claims included a Vehicle Identification Number indicating a different manufacturer and therefore, Hammerhead has insufficient knowledge or information to admit or deny any other allegations contained in Paragraph 55(c).
- d. The allegations in Paragraph 55(d) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 55(d).
- e. Hammerhead admits the allegations in Paragraph 55(e).

- f. The allegations in Paragraph 55(f) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 55(f).

56. Hammerhead addresses the allegations contained in Paragraph 56(a) through 56(f) of the Complaint below:

- a. The allegations in Paragraph 56(a) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 56(a).
- b. The allegations in Paragraph 56(b) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 56(b).
- c. Hammerhead admits that Shanghai Tong Jian Sports Equipment Co., Ltd. is the manufacturer listed on the COC application for the engine family alleged in Paragraph 56(c). Paragraph 56(c) fails to identify with specificity the vehicles that EPA claims included a Vehicle Identification Number indicating a different manufacturer and therefore, Hammerhead has insufficient knowledge or information to admit or deny any other allegations contained in Paragraph 56(c).
- d. The allegations in Paragraph 56(d) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 56(d).
- e. Hammerhead admits the allegations in Paragraph 56(e).

- f. The allegations in Paragraph 56(f) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 56(f).

57. Hammerhead addresses the allegations contained in Paragraph 57(a) through 57(c) of the Complaint below:

- a. The allegations in Paragraph 57(a) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 57(a).
- b. Hammerhead admits the allegations in Paragraph 57(b).
- c. The allegations in Paragraph 57(c) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 57(c).

58. Hammerhead addresses the allegations contained in Paragraph 58(a) through 58(e) of the Complaint below:

- a. The allegations in Paragraph 58(a) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 58(a).
- b. The allegations in Paragraph 58(b) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 58(b).
- c. The allegations in Paragraph 58(c) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 58(c).

- d. Hammerhead admits the allegations in Paragraph 58(d).
- e. The allegations in Paragraph 58(e) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 58(e).

59. Hammerhead addresses the allegations contained in Paragraph 59(a) through 59(c) of the Complaint below:

- a. The allegations in Paragraph 59(a) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 59(a).
- b. Hammerhead admits the allegations in Paragraph 59(b).
- c. The allegations in Paragraph 59(c) state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 59(c).

Labeling Violations

- 60. The allegations in Paragraph 60 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 60(a).
- 61. The allegations in Paragraph 61 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 61.
- 62. The allegations in Paragraph 62 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 62.

Recordkeeping Violations

63. The allegations in Paragraph 63 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 63.
64. The allegations in Paragraph 64 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 64.
65. The allegations in Paragraph 65 state legal conclusions to which no answer is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 65.

Relief Sought: Civil Penalty

66. The allegations on proposed civil penalties contained in Paragraph 66 consist of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 66.
67. The allegations on proposed civil penalties contained in Paragraph 67 consist of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 67.
68. The allegations on proposed civil penalties contained in Paragraph 68 consist of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 68.
69. The allegations on proposed civil penalties contained in Paragraph 69 consist of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 69.

70. The allegations on proposed civil penalties contained in Paragraph 70 consist of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 70.

71. The allegations on proposed civil penalties contained in Paragraph 71 consist of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 71.

72. The allegations on proposed civil penalties contained in Paragraph 72 consist of statements of law, legal conclusions, and or statements to which no response is required. To the extent that a response is required, Hammerhead hereby denies the allegations in Paragraph 72.

Opportunity to Request a Hearing

In accordance with the Administrative Procedure Act, 5. U.S.C. Section 552 et seq., and 40 C.F.R. Section 22.15, Hammerhead hereby requests a Hearing.

Answer

Hammerhead's basis for contesting the Complaint and the proposed penalty are set forth in this Answer and its affirmative defenses below. Hammerhead reserves the right to allege additional facts and assert additional defenses, upon discovery or learning of new information.

DEFENSES

FIRST SEPARATE DEFENSE

Hammerhead incorporates hereto by reference, all denials and averments in the preceding Answer and makes them part of these affirmative defenses.

SECOND SEPARATE DEFENSE

Hammerhead believes that the imposition of any administrative penalty is inappropriate given the circumstances of this case and Hammerhead's history of efforts to comply. Hammerhead has made substantial good faith efforts to cooperate with EPA and to comply with the Clean Air Act.

THIRD SEPARATE DEFENSE

The Complaint fails to state a claim upon which a Class II Civil Penalty can be levied.

FOURTH SEPARATE DEFENSE

The alleged facts and resulting alleged violations did not cause any harm or threat to human health or to the environment. Many of the vehicles that are the subject of EPA's Complaint were never sold in the United States and Hammerhead did not or is not deriving any economic benefit.

FIFTH SEPARATE DEFENSE

EPA's claims are barred by the doctrines of equitable estoppel and waiver.

SIXTH SEPARATE DEFENSE

The claims brought by EPA reflect damages that are wholly speculative, conjectural, unreasonable, excessive and/or arbitrary and capricious.

SEVENTH SEPARATE DEFENSE

The alleged violations asserted by EPA in Counts 1 through 11 of its Complaint did not result in any actual or potential harm to human health or the environment.

EIGHTH SEPARATE DEFENSE

Hammerhead did not purposefully, knowingly or willfully violate the Clean Air Act, any regulations promulgated thereto, or any of its permits.

NINTH SEPARATE DEFENSE

The Complaint alleges that each Respondent has responsibility for each violation, even where the EPA concedes the manufacturer to be an unnamed respondent and even though the EPA concedes that at least two named manufacturers were involved in manufacturing. The Complaint therefore fails to give fair notice as to which specific counts each Respondent is alleged to be liable.

TENTH SEPARATE DEFENSE

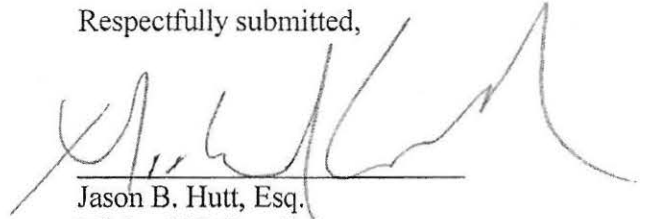
Hammerhead cooperated in good faith with EPA at all times and promptly responded to EPA's document and information requests.

ELEVENTH SEPARATE DEFENSE

EPA is barred and/or limited from bringing this action and/or seeking a penalty pursuant to the Statute of Limitations, including but not limited to 28 U.S.C. § 2462, and/or pursuant to the doctrine of laches.

WHEREFORE, in view of the foregoing, Hammerhead respectfully requests, that after the appropriate proceedings, including the hearing requested herein, that the Administrative Law Judge dismiss the Complaint in its entirety.

Respectfully submitted,



Jason B. Hutt, Esq.

Michael Weller, Esq.

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Counsel to Geason Enterprises L.L.C.,

GE Ventures, L.P., Hammerhead

Off-Road, Inc., and TJ Power

Sports L.L.C.

DATE: September 30, 2013

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

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Off-Road, Inc., TJ Power Sports L.L.C.,)
Shanghai Howhit Machinery Manufacture)
Co. Ltd., and Shanghai Tong Jian Sports)
Equipment Co., Ltd.)

Docket No.
CAA-HQ-2013-8050

CERTIFICATE OF SERVICE

Pursuant to 40 CFR § 22.5(a)(3), I hereby certify that a true and correct original and two copies of this Answer to the Complaint and Request for Hearing were served upon the following individuals via courier.

U.S. Environmental Protection Agency
Office of the Hearing Clerk
Office of Administrative Law Judges
Ronald Regan Building, Rm. M1200
1300 Pennsylvania Ave., N.W.
Washington, D.C. 20004

Pursuant to 40 CFR § 22.5(a)(3), I hereby certify that one true and correct copy of this Answer to the Complaint and Request for Hearing was served upon the following individuals via overnight mail and e-mail.

Meetu Kaul
U.S. EPA, Air Enforcement Division
1200 Pennsylvania Ave., N.W.
William Jefferson Clinton Building South, Room 3151A
Washington, D.C. 20004
Email: kaul.meetu@epa.gov

Ronald J. Tenpas
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Washington, D.C. 20004
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DATE: September 30, 2013